

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

YOUNG YI,

Defendant.

Criminal No. 1:17-CR-224

Hon. Liam O'Grady

Trial Date: July 16, 2018

MOTION FOR USE IMMUNITY FOR TRIAL TESTIMONY

G. Zachary Terwilliger, United States Attorney for the Eastern District of Virginia, hereby moves that this Court issue an order pursuant to the provisions of Title 18, United States Code, Section 6001, et. seq., compelling Sarah Toran to give testimony or provide other information, which Sarah Toran refuses to give or provide on the basis of her privilege against self-incrimination as to all matters about which Sarah Toran may be interrogated in the trial styled United States v. Young Yi, Criminal No. 17-CR-2224, and respectfully alleges as follows:

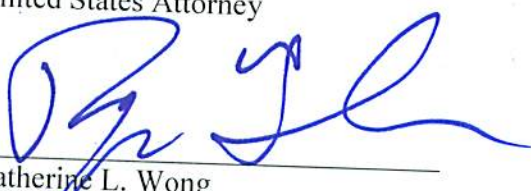
1. Sarah Toran has been called to testify or provide other information before said trial;
2. In the judgment of the undersigned, the testimony or other information from said witness may be necessary to the public interest.
3. In the judgment of the undersigned, said witness has refused to testify or provide other information on the basis of her privilege against self-incrimination.
4. This application is made with the approval of Raymond N. Hulser, Deputy Assistant Attorney General in charge of the Criminal Division of the Department of Justice, pursuant to the authority vested in him by Title 18, United States Code, Section 6003 and Title 28, Code of

Federal Regulations, Section 0.175. A copy of the letter from said Acting Assistant Attorney General expressing such approval is attached hereto.

Respectfully submitted,

G. Zachary Terwilliger
United States Attorney

By:



Katherine L. Wong
Ryan Scott Faulconer
Assistant United States Attorneys

Kevin Lowell
Special Assistant United States Attorney



U.S. Department of Justice

Criminal Division

Assistant Attorney General

Washington, D.C. 20530

JUL 06 2018

The Honorable G. Zachary Terwilliger
United States Attorney
Eastern District of Virginia
Office of the United States Attorney
Justin W. Williams United States Attorney's Building
2100 Jamieson Avenue
Alexandria, Virginia 22314

Attention: Katherine Wong
Assistant United States Attorney

Re: *United States v. Young Yi*

Dear Mr. Terwilliger:

Pursuant to the authority vested in me by 18 U.S.C. § 6003(b) and 28 C.F.R. § 0.175(a), I hereby approve your request for authority to apply to the United States District Court for the Eastern District of Virginia for an order, pursuant to 18 U.S.C. §§ 6002-6003, requiring Sarah Toran to give testimony or provide other information in the above matter and in any further proceedings resulting therefrom or ancillary thereto, provided that the witness refuses to testify or provide information on the basis of the privilege against self-incrimination.

Sincerely,

A handwritten signature in black ink, appearing to be "RH", is written over the typed name of Raymond N. Hulser.

Raymond N. Hulser
Deputy Assistant Attorney General